

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

ABC IP, LLC, a Delaware limited liability)	
company,)	CASE NO. EP-25-cv-201-DCG
and)	
Rare Breed Triggers, Inc., a Texas)	
corporation,)	JOINT STATUS REPORT OF
)	SETTLEMENT NEGOTIATIONS
Plaintiffs.)	
)	
v.)	
)	
Hanes Tactical LLC, a Texas limited liability)	
company,)	
and)	
Damion Terrell Bennett, an individual,)	
)	
Defendants.)	

Pursuant to Local Civil Rule 88 and this Court’s Scheduling Order (Doc. 19), Plaintiffs and Defendants (collectively “the Parties”) hereby submit a Joint Status Report of Settlement Negotiations.

Glenn D. Bellamy is responsible for settlement negotiations on behalf of the Plaintiffs and John M. Skeriotis is responsible for Defendants.

On September 26, 2025, Plaintiffs submitted a detailed written offer of settlement to the Defendants. The Defendants responded with a counteroffer on October 9, 2025. Plaintiffs proposed a further counteroffer on October 15, 2025. Defendants have not yet responded.

The Parties submit that formal ADR is not appropriate at this time, as progress has and continues to be made without further or outside assistance. The Parties will advise promptly if this view changes.

Respectfully submitted,

s/Glenn D. Bellamy

Glenn D. Bellamy, Ohio Bar No. 0070321
Wood Herron & Evans LLP
600 Vine Street, Suite 2800
Cincinnati, OH 45202
Tel: (513) 707-0243
Fax: (513) 241-6234
E-mail: gbellamy@whe-law.com

Attorney for Plaintiffs

s/John M. Skeriotis

John M. Skeriotis, (Ohio Bar 0069263)
Emerson, Thomson & Bennett, LLC
1914 Akron Peninsula Road
Akron, Ohio 44313
Telephone: (330) 434-9999
jms@etblaw.com

Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on this 16th day of October, 2025. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/Glenn D. Bellamy/

Glenn D. Bellamy